

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA.

CASE NO: 00-6309-CF-SEITZ

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

JULIUS BRUCE CHIUSANO,

Defendant.

MOTION TO EXONERATE BOND

COMES NOW, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel and files this his Motion to Exonerate Bond and in support thereof, the Defendant would submit the following:

1. That this Honorable Court on or about October 26, 2001, entered an order releasing the Defendant on a \$50,000.00 corporate surety bond held by Universal Bail Bonds and a \$100,000.00 personal surety bond.

2. That consistent with this Honorable Court's Order dated January 7, 2002, the Defendant voluntarily surrender on February 6, 2002, to the Federal Correctional Institution located at 15801 SW 137th Avenue, Miami, Florida, to serve the eighteen (18) months sentence imposed by this Court, as well as a twenty-four (24) month sentence imposed concurrently by the Honorable Paul C. Huck, in Case No. 00-6273-CR-Huck.

3. That as the Defendant has fully complied with all conditions of his bond and properly surrendered to the Bureau of Prisons on February 6, 2002, Defendant respectfully requests this Honorable Court enter an order exonerating both the \$50,000.00 corporate surety bond held by Universal Bail Bonds and the \$100,000.00 personal surety bond.

WHEREFORE, based upon the foregoing, the Defendant, JULIUS BRUCE CHIUSANO, respectfully requests this Honorable Court enter an order exonerating both the \$50,000.00 corporate surety bond held by Universal Bail Bonds, as well as the \$100,000.00 personal surety bond.

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10-G CERTIFICATE

That undersigned counsel, pursuant to Local Rule 10(G)(1) certifies that he has contacted the opposing counsel, Assistant United States Attorney, Brian McCormick, of the Southern District of Florida in an effort of good faith to resolve by agreement the subject matter and he states that he has no objection to the granting of this motion.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Brian McCormick, Assistant United States Attorney, United States Attorney's Office, 299 East Broward Boulevard, Fort Lauderdale, FL 33301, by Facsimile (954-356-7230) and Raul Sagaro, Pretrial Services, 330 Biscayne Blvd., Suite 500, Miami, FL 33132, by Facsimile 305-530-7123, and by U.S. Mail, and the original hereof filed with the Clerk of the Court, by Mail Delivery, this 8th FEBRUARY, 2002.

Respectfully submitted,

DONALD R. SPADARO, P.A.
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By: 

DONALD R. SPADARO, ESQUIRE
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